SACRAMENTO

Communication

Communications via Tech Workgroup

The process should include an annual LUFT program improvement conference for all to attend - public hearing

Have on-going group to update LUFT - similar to ASTM groups

UST Cleanup Fund
Review of financial history/forecast with closure as objective every 2 years
Consistent of standardized invoice format
Nobody uses the cost guidelines - get rid of nickel & dime mentality

Remove the disagreement between regulators and the Fund

Effective project implementation; time restricted project implementation for the state funded project

Create new expedited procedures to address catastrophic releases (Resources: UST Fund, CAL EPA (Waterboards), no success stories to date)

Fund must be involved with workplan development
Multi-year plan
Required info for cleanup fund
When WPs are pre-approved, Fund should not go back on the pre-approved WP & cost

Agency Accountability
SWRCB, RPs, the Regulated Public
Compliance with "60-day" rule for agency review of documents

Regular program report cards (Geotracker/SCUFIIS)

Eliminate some LOPs!

Regulation and Fund should agree on WPs (WP = Workplan?)

Agency contact for banks/realtors - Liason to explain environmental issues to lenders and property buyers/sellers (State or federal)

The LUFT program should have an advisory group that actually has some input to improving the process)

Tech support request process for regulators (SWRCB/EPA…)

RWQCB/LOP assistance on permits for Remed. Systems) - AQMD, City/Local regulators

Investigation and Remediation

Investigation and Remediation need phase overlap toward the mid or end part of investigative phase

The Triad approach to Site Remediation

Implement interim remedial actions for source areas

Investigations should be completed in one or two phases only

Clarity around sample collection

Analysis

TPHg/GRO clarifications (uses and C ranges (?))

Reporting

Appoint tech review group for each region to review NFA

Should "Ready for reuse" determinations be made

Consistent reporting formats

Tie Geotracker and LUFT Manual (Via link) for ready access (By updating LUFT manual we may get more people using it as a reference by giving link on GeoTracker web site)
Cataloging successes and failures for evolving technologies (Web-based)
Annual status report with recommended course of action for the next year

Closure, incl. criteria

Criteria for closure

Set closure criteria to distinguish between low-risk vs. threat cleanups; e.g. asymptotic decrease just above WQO; Decreaseing groundwater plume not going anywhere
Make use of the 1996 "Low Risk Guidelines" from each RWQCB

What are other states doing?

LOS ANGELES

Communication

RP must keep a hand in the cleanup activities of the site

Sharing best closure practices/successes amongst agencies, consultants, RPs on some periodic bases (and/or nightmares)
Site investigation stakeholder meetings w/RP, consult, regulators

UST Cleanup Fund

Need more USTCF staff to implement preapproval
CC USTCF on directive letters

Fund pre-approval involves USTCF in the WP development

Agency Accountability
Motivate the regulators

Remove the fear of retribution when annoying the regulator

Incentivize agencies to close UST cases
State Board should take up cleaning of recalcitrant sites, then look for RP later

Make a plan to aggressively address old cases

Where staff (agency) shortages exist, allow RPs to fund additional staff to help move caseloads "cost recovery" – done in other states

Tx example – state-certified "Corrective Action process Mgr" who can self-direct case w/out requiring case-worker (agency) approval for every step of the work – yet, still maintain USTCF eligibility

Workplans

Phased approach to site investigation in one workplan

Workplans must have contingencies and be flexible
Eliminate need for agency approval of interim assessment workplans
60-day turnaround on W. plan, report and request for closure review – by regulators

Analysis

Revise list by analytical methods, i.e. 5035 for EtOH, MeOH

Reporting

Standard report submission guidelines

Reporting standards to include conclusions and recommendations

Closure, incl. criteria
"When are we Done?" – Determine the Cleanup goal early in the process

Set achievable MDL/PQLs, i.e., diesel for soil and water matrices

OAKLAND

Communication
Kick off meeting with Stakeholders - State goals, risks and concerns

Regular communication between regulators and consultants, focused on problem solving
Regulator, RP, Consultant should meet early on to develop the SCM outline

UST Cleanup Fund

USTCF evaluates workplans for costs
Define "reasonable + necessary" costs

USTCF should prioritize reimbursement of high-risk sites
Financial method of reimbursement encourages poor quality work

Peer Review Process - USTCF staff at LOP offices

Develop a reasonable accounting + administrative process

Peer Review Process - Appropriate peer review of workplans and budgets

Agency Accountability
Regulators: be more flexible

Communication and responsiveness on part of regulators

Better regulator training and resources

Regulators: increase consistency within regions, agencies

Cleanup schedule in Geotracker

Peer Review Process - qualified LOP staff reduces USTCF second guessing of reimbursements

Regulators need to allow professionals to conduct a site assessment and corrective action

Develop reliable technical peer review process

Investigation and Remediation

Develop process for use of flexible/dynamic workplans and get buy-in from regulators
Iterative approval process needs to be abandoned with quality workplans
Interim source area remediation simultaneous with plume assessment
Provide description of appropriate sample preparation techniques

Continuously update SCM, identify data gaps, propose recommendations with justification

Concurrent mass removal and plume delineation - do early in the process!

Require a remedial screening analysis before testing feasibility of remedial options if remediation identified as necessary. RSA would identify target zone of remediation, target cleanup concentrations for affected media, amount of contaminant mass requiring removal, and remedial alternatives suitable for removing mass given site conditions

Risk Assessment

SCM -> Risk
Use of risk assessment is inconsistent

Analysis

Provide guide for labs on "flagging" reported numbers
Explain/standardize filtration protocol (for metals, gen'l sample prep, etc.)

Define silica gel cleanup parameters (its limitations, when to use, what it means, etc.)

Define what TPH is (range definition for gasoline, diesel, M.O., etc.)
Standardize TPH Ranges

Reporting

Poor quality reports confuse and take time of the regulator

Corrective Action Plan needs to have costs included

Include Geotracker maintenance

Combine CAP and FS in one document

Closure, incl. criteria

Meet early with RP/Regulator to discuss cleanup targets

Some remediation/closure decisions are made based on avoiding public controversy rather than science

Post-closure management as part of closure plan

Determine closure criteria at beginning of project

Local cleanup goals vs. "site specific" cleanup goals

Other
Natural selection should be encouraged to weed out poor quality work/consultants

ORANGE COUNTY

Communication
Conduct pre-field meeting with regulators and consulting agency prior to work (SV/VI)

UST Cleanup Fund

Better communication with USTCF

Agency Accountability
Technical training for LIAs
Set turnaround times for agency feedback on various regulatory submissions.
Develop specialized groups w/in agencies to facilitate review of SV/VI

Minimize levels of Regulatory Agency Review/ Approval

Create a way for sites that are ready for closures to become a higher priority for regulators

Investigation and Remediation

Avoid canned approach for assessment
Manual needs to address what screening levels should/ should not be used for (SV/VI)
Guidance for when mitigation is required OR not required. (Soil vaport SV/VI)

Make standard of care into the industry standard
Clearly state importance of risk vs. cost to environment (sustainability) in assessing if remediation/ GW monitoring is necessary

Include checklist to Summarize specific actions.
Examples - steps for a site assessment

Create steering committee to guide RA and RA training process

Risk Assessment
Create groups of specialized regulators to review Risk Assessment/ RBCA

Analysis

Standardize analyses required

Include oxygenates and daughter products
Standardize the list of analytes on a statewide basis. Each region has different test criteria, and most are not testing for PAHs.

Reporting

Electronic submittals of reports to regulatory agencies

Adopt a consistent guideline for report/ site assessment/ remediation report preparation such as SAM manual (Contact: Kevin Heaton at SDDEH)

Have consultant submit closure summary with request

Explicit requirements from Agency to consultants for report content
- helps ensure quality reports
- helps consultants get reimbursed from client
- less back and forth between agency/ consultants

Closure, incl. criteria
Revisit SCM at closure (e.g. develop checklist; Riverside has 16 points for closure)

Revise the non-degradation policy to allow closure above MCLs (SWRCB + RWQCB

Formalize an appeal process

Risk- based clean-up goals